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ANCHOR ENVIRONMENTAL, L.L.C.

1411 4th Avenue, Suite 1210
Seattle, WA 98101
Phone 206.287.9130
Fax 206.287.9131
www.anchorenv.com

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August 16, 2002
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Ms. Anna I. Filutowski
U.S. EPA, Region 10
1200 Sixth Avenue, WCM-126
Seattle, WA 98101-3188
Hand-Delivered

RECEIVED
AUG 21 2002

Mr. William Ernst
Company Energy & Environmental Affairs
The Boeing Company
P.O. Box 3707 MC 7A-WW
Seattle, WA 98124-2207
Via Regular Mail

Re: Draft Transformer PCB Investigation Plan
Prepared by The Boeing Company
June 27, 2002

Dear Ms. Filutowski and Mr. Ernst:

Jorgensen Forge Corporation (Jorgensen Forge) appreciates the opportunity to provide comments on the draft Transformer PCB Investigation Plan (Plan), dated June 27, 2002. Based on our August 6, 2002, meeting with The Boeing Company (Boeing) and subsequent discussions with the U.S. EPA (EPA), Jorgensen Forge is taking this opportunity to submit comments on the draft Plan. We anticipate that EPA will consider these comments and, to the extent that they agree with them, incorporate these comments into EPA's comments on the Plan.

Jorgensen Forge understands that Boeing is required to develop and implement an EPA approved plan as directed in EPA's May 23, 2002, letter. Further, we understand that the objective of this Plan is to describe an investigation necessary to delineate the vertical and horizontal extent of polychlorinated biphenyls (PCBs) associated with the Seattle City Light (previously Puget Power) transformer located on the southern part of Boeing Plant 2. PCBs associated with the transformer were discovered in November 2001 during replacement of secondary containment curbing adjacent to the transformer. Jorgensen Forge requests a copy of these November 2001 sample results (including locations).

Our comments on the draft Plan are:

1. Figure 2 provides a summary of existing total PCB data in the vicinity of the transformer but does not present the November 2001 data. These data also do not describe which Aroclor(s) were detected. Figure 2 should be modified to include the November 2001 data and the identity of the Aroclor(s) detected.
2. The migration potential for transformer oil (and any associated PCBs) is limited and preferential pathways should be identified. The potential that PCB migration is associated with solvent plumes should also be assessed.
3. The presence of, type, and depth of a stormwater drain system located along the Boeing/Jorgensen property boundary (within the easement) should be determined and the potential for it to be a preferential migration pathway to the river or a barrier for migration onto the Jorgensen Forge property should be evaluated.
4. Based on the data presented on Figure 2, the number, type, and location of samples seems excessive and inconsistent with the existing information. For example, SB-07202 and SB-07206 have undetected PCB concentrations at all depths and indicate that PCBs have not migrated onto the Jorgensen Forge property. SB-07201 and SB-07210 indicate minor detections in the 0 to 2 foot interval and the 8 to 11.5 foot interval, respectively. None of this information indicates that the elevated detections found on the Boeing property (Figure 2) or those reported from the November 2001 sampling event have migrated onto the Jorgensen Forge property.
5. However, given the detections at SB-07207, SB-07205, and SB-07203 (and the lesser detections at SB-07201 and SB-07210), we support a phased approach to assess the extent of PCB migration onto the Jorgensen Forge property and along any preferential pathways (if identified).
6. Our recommended approach for this phased approach would involve:
    a. Soil sampling at SB-07246, SB-07234, SB-07245, SB-07228, SB-07220, SB-07221, SB-07224, and a new soil boring at the former SB-07210 location (in addition to those proposed on the Boeing property). Jorgensen Forge does not think that the other soil boring locations or bank locations are warranted.
    b. If soil sampling results indicate that the vertical or horizontal extent of PCBs is not determined, Jorgensen Forge would be open to a discussion regarding whether additional sampling is warranted based on the sampling results.
    c. Surface sediment sampling at SD-DUW141, SD-DUW140, SD-DUW139, SD-DUW138, SD-DUW137, and at the terminus of the stormwater drain system on the property boundary (if confirmed to exist).
    d. Groundwater sampling at PL2-JF01A in addition to that proposed on the Boeing property. Jorgensen Forge does not think that the other groundwater location is warranted.
    e. Soil and sediment samples should be submitted for the analysis of PCBs (Aroclors), total solids, total organic carbon (TOC), and grain size. Reporting limits for PCBs should be low enough, when corrected for total solids and TOC,

to assess compliance with Ecology's Sediment Management Standards' (SMS) sediment quality standards (SQS) or lowest apparent effects threshold (AET).

Upon resolution and incorporation of these comments into, and our review of, the Final Plan, Jorgensen Forge will be prepared to consent to implementation of the final EPA-approved plan and to execute a modification to the License Agreement, executed September 7, 1995, to allow Boeing access to conduct soil sampling pursuant thereto. Jorgensen Forge would also require split samples of all soil and sediment samples (adequate volume will need to be allowed for) and will have a representative on site during sampling.

We support Boeing's efforts, in conjunction with EPA, to determine whether the Seattle City Light (previously Puget Power) transformer is or was a potential source of PCBs to the Jorgensen Forge property or the Duwamish Waterway. Jorgensen Forge would like to reiterate that Jorgensen Forge has only been on the property since 1992. Earle M. Jorgensen Company (EMJC) was the previous property owner and operator and owned the property from approximately 1965 to 1992. EMJC is an active corporation, to which Jorgensen Forge is not the successor. Furthermore, Jorgensen Forge has found no evidence that the property has been or is a source of PCBs to the Duwamish Waterway. In fact, EPA performed a TSCA inspection in late 2001 and determined that the property was not a "source of PCBs other than in transformers that have been retrofitted."

If you would like to discuss these comments, please do not hesitate to reach me at (206) 287-9130 or at dtempleton@anchorenv.com.

Sincerely,

Ryan Barth for

David Templeton
Partner
Anchor Environmental, L.L.C.

Cc: Ron Altier, Jorgensen Forge Corporation
Kim Maree Johannessen, Johannessen & Associates, P.S.